

ORIGINAL

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION



CITY OF GRANITE CITY,
an Illinois municipal corporation,

Petitioner,

ILLINOIS DEPARTMENT OF TRANSPORTATION
GATEWAY EASTERN RAILWAY COMPANY,
GATEWAY WESTERN RAILWAY COMPANY,
NORFOLK SOUTHERN RAILWAY COMPANY,
and UNION PACIFIC RAILROAD,

Respondents.

Docket No. T00-0003

**REQUESTS FOR PRODUCTION BY RESPONDENTS GATEWAY EASTERN RAILWAY
COMPANY AND GATEWAY WESTERN RAILWAY COMPANY
DIRECTED TO PETITIONER CITY OF GRANITE CITY**

COME NOW Respondents Gateway Eastern Railway Company and Gateway Western Railway Company and pursuant to Section 200.360(c) of the Illinois Commerce Commission Rules of Practice and Rule 214 of the Illinois Rules of Civil Procedure propound the following Requests for Production to Petitioner to be answered in writing with a certificate of compliance under oath within 28 days of the date of service of these requests.

1. Any and all minutes of any meeting of the City Council for the City of Granite City at which there was any discussion or any report was submitted regarding the rail-highway grade separation project (including associated grade crossing closures and road relocations) that is the subject matter of the Petition filed by the City of Granite City in this cause (hereinafter referred to as "Pontoon Road Grade Separation Project").

RESPONSE:

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2. Any and all documents or reports that were distributed to members of the City Council for the City of Granite City in the past 10 years relating to the Pontoon Road Grade Separation Project.

RESPONSE:

3. Any and all documents or reports prepared in the past 10 years relating to any investigation, study or analysis of the feasibility, cost, or funding options for the Pontoon Road Grade Separation Project.

RESPONSE:

4. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of the Pontoon Road/Route 203 intersection.

RESPONSE:

5. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of traffic congestion or traffic flow on Pontoon Road or Route 203.

RESPONSE:

6. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of traffic congestion or traffic flow in Granite City.

RESPONSE:

7. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of the potential impact on Granite City and/or Madison County of the proposed new I-70 Mississippi River crossing.

RESPONSE:

8. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of the impact of railroad tracks and grade crossings on Granite City.

RESPONSE:

9. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of economic, industrial, commercial, or residential development in Granite City and/or surrounding areas.

RESPONSE:

10. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of economic, industrial, commercial, or residential development in Madison County.

RESPONSE:

11. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of economic or real estate development along the Route 203 corridor.

RESPONSE:

12. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of land use, land development, issuance of building or occupancy permits, or other measure of economic activity in any area that includes land within a one-mile radius of the Pontoon Road/Route 203 intersection.

RESPONSE:

13. Any and all documents or reports prepared in the past 10 years relating to any comprehensive or master plan for the development of land that includes land within a one-mile radius of the Pontoon Road/Route 203 intersection.

RESPONSE:

14. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of access of emergency response vehicles to residential, commercial or industrial sites within the City of Granite City.

RESPONSE:

15. Any and all documents or reports prepared by any person or company retained by the City of Granite City to provide consulting services with respect to the Pontoon Road Grade Separation Project.

RESPONSE:

16. Any and all documents or reports prepared in the last 10 years analyzing traffic accidents at the Pontoon Road/Route 203 intersection.

RESPONSE:

17. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of safety issues with respect to rail traffic in Granite City.

RESPONSE:

18. Any and all documents or reports prepared in the past 10 years relating to any cost-benefit analysis of the Pontoon Road Grade Separation Project

RESPONSE:

19. Any and all documents that discuss the percentage of the total cost of the Pontoon Road Grade Separation Project that benefits the railroads that operate trains through the grade crossing at Pontoon Road.

RESPONSE:

20. Any and all documents that discuss how the Pontoon Road Grade Separation Project benefits each railroad that operates trains through the grade crossing at Pontoon Road.

RESPONSE:

21. Any and all documents that quantify in dollars or as a percentage of the total project costs the benefit of the Pontoon Road Grade Separation Project to the railroads that operate through the grade crossing at Pontoon Road.

RESPONSE:

22 Any and all documents that discuss how the Pontoon Road Grade Separation Project benefits the City of Granite City and/or its citizens.

RESPONSE:

23 Any and all documents that quantify in dollars or as a percentage of the total project costs the benefit of the Pontoon Road Grade Separation Project to the City of Granite City and/or its citizens.

RESPONSE:

24. Any and all documents that discuss how the Pontoon Road Grade Separation Project benefits Madison County and/or its citizens.

RESPONSE:

25. Any and all documents that quantify in dollars or as a percentage of the total project costs the benefit of the Pontoon Road Grade Separation Project to Madison County and/or its citizens.

RESPONSE:

26. Any and all documents that discuss how the Pontoon Road Grade Separation Project benefits the State of Illinois and/or its citizens.

RESPONSE:

27. Any and all documents that quantify in dollars or as a percentage of the total project costs the benefit of the Pontoon Road Grade Separation Project to the State of Illinois and/or its citizens.

RESPONSE:

28. Any and all documents that identify entities other than the citizens of City of Granite City, Madison County, and the State of Illinois, and the railroads, that will benefit from the Pontoon Road Grade Separation Project.

RESPONSE:

29. Any and all documents that discuss or relate to any application or petition by anyone to the Illinois Department of Transportation for funding of any type for the Pontoon Road Grade Separation Project.

RESPONSE:

30. Any and all documents that discuss or relate to any application or petition by anyone to the U.S. Department of Transportation for funding of any type for the Pontoon Road Grade Separation Project.

RESPONSE:

31. Any and all correspondence or other documents that relate to communications between any representative of the City of Granite City and any employee or representative (including elected representatives) of Illinois state government regarding the Pontoon Road Grade Separation Project.

RESPONSE:

32. Any and all correspondence or other documents that relate to communications between any employees or representative of the City of Granite City and any employee or representative (including elected representatives) of the federal government regarding the Pontoon Road Grade Separation Project.

RESPONSE:

33. Any and all correspondence or other documents that relate to communications between any employee or representative of the Illinois Department of Transportation and any employee or representative of any other agency or department of the State of Illinois.

RESPONSE:

34. Any and all correspondence or other documents that relate to any communications between any employee or representative of the Illinois Department of Transportation and any state elected official regarding the Pontoon Road Grade Separation Project.

RESPONSE:

35. Any and all documents relating to any analysis of the impact, if any, the failure to include federal funding in the Pontoon Road Grade Separation Project will have on the availability of state funding for other highway or highway-rail crossing projects in the state of Illinois over the next ten years.

RESPONSE:

36. Any and all documents relating to any application by anyone to the Illinois Department of Transportation's Bureau of Railroads for funding for any aspect of the Pontoon Road Grade Separation Project.

RESPONSE:

37. Any and all documents that discuss or analyze how much of the total cost of the Pontoon Road Grade Separation Project is directed to relocation of roads and utilities.

RESPONSE:

38. Any and all documents relating to any investigation, study, or analysis comparing the number of projected motor vehicle-train collisions at the Pontoon Road Crossing in the future if the grade crossing is left in its present configuration versus the number of projected future motor vehicle-train collisions at the crossing if a grade separation is built versus the number of projected motor vehicle-train collisions at the crossing in the future if some other type of upgrade is made to the crossing.

RESPONSE:

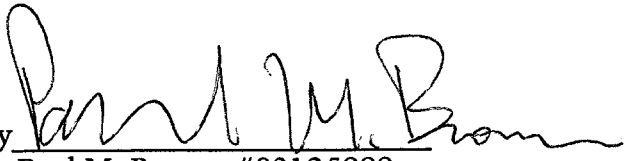
39. Any and all documents relating to any analysis of the number of motor vehicle-train collisions that will occur at the Pontoon Road Crossing in the next twenty years if the grade separation is not built and the crossing is left in its present configuration.

RESPONSE:

OF COUNSEL:

Thompson Coburn LLP

Respectfully submitted,

By 

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Attorneys for Gateway Eastern
Railway Company and Gateway
Western Railway Company

CERTIFICATE OF SERVICE

The undersigned states that a true and correct copy of the foregoing requests for production were deposited in the U.S. Mail, first Class, postage prepaid on the 2nd day of October, 2000, addressed to each of the following:

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